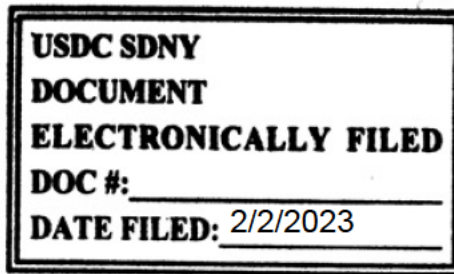


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February 1, 2023

VIA ECF

The Honorable Robert W. Lehrburger
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *In re Application of Forensic News LLC & Scott Stedman*, No. 22-MC-0229

Dear Judge Lehrburger:

We write pursuant to Rule III(D) of Your Honor's Individual Practices as counsel to independent news organization Forensic News LLC and its founder Scott Stedman ("Petitioners"). On January 24, 2023, Petitioners filed a letter motion to temporarily file a Motion to Compel under seal. *See* Dkt. 17. We did so based on Respondent Mark Rossini's request at the end of his deposition to treat the transcript confidential for fourteen days. Pursuant to the Court's rules, after we filed our motion to seal, we wrote Mr. Rossini's counsel, also on January 24, asking to meet and confer within 5 days on redactions. Mr. Rossini's counsel never responded.

We respectfully submit as a result, Mr. Rossini has not borne his burden of establishing that the redactions we have made based on his confidentiality designations are properly sealable. As such, the documents filed at docket entries 19, 19-1, and 19-2 need not be sealed and may be filed on the public docket.

Thank you for your kind consideration.

Sincerely,

GIBSON, DUNN & CRUTCHER LLP

s/ Anne Champion
Anne Champion

cc: All counsel of record (via ECF)

Based on Mr. Rossini's letter at Dkt. 26, the parties are in agreement with respect to whether Dkt. 19 should remain under seal and agree that it should not. Accordingly, an unredacted copy of Dkt. 19 shall be filed on the public record.

SO ORDERED:

2/2/2023

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE